



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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MAY 03 2012

Jake Causey P. E. Chief Engineer
Louisiana Department of Health and Hospitals
Engineering Services Central Office
P. O. Box 4489
Baton Rouge, LA 70821-7303

Dear Mr. Causey:

Enclosed is the Fiscal Year 2011 program review of the Louisiana Department of Health and Hospitals (LDHH) Public Water Supply Supervision (PWSS) Program. This program review summarizes LDHH's primacy requirements, program implementation of new and existing regulations, and other key drinking water activities conducted by LDHH.

Thank you for your participation in the PWSS program review process. Please contact Amy Camacho of my staff at (214) 665-7175 should you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Blam F. and".

for Stacy B. Dwyer, P. E.
Associate Director
Source Water Protection Branch

Enclosure

**Environmental Protection Agency
Fiscal Year 2011 Program Review Report**

on the

**Louisiana Department of Health and Hospitals
Office of Public Health
Public Water System Supervision (PWSS) Program**

May 3, 2012

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I. INTRODUCTION

Title 40 of the Code of Federal Regulations (40 CFR) Part 142.17 (a)(1) states: At least annually the Administrator shall review, with respect to each State determined to have primary enforcement responsibility, the compliance of the State with the requirements set forth in 40 CFR part 142, subpart B, and the approved State primacy program. This report summarizes the primacy end-of-year (EOY) review of the Louisiana Department of Health and Hospitals (LDHH) Office of Public Health (OPH) Public Water Supply Supervision (PWSS) Program. The program review is conducted by the Environmental Protection Agency (EPA) Region 6 (R6) Source Water Protection Branch, Drinking Water Section.

The LDHH program elements, which were previously adopted by the State and approved by EPA to meet 40 CFR 142.10 primacy requirements, are examined as well as State activities to meet new primary enforcement authority requirements and initiatives under the 1996 Amendments to the Safe Drinking Water Act (SDWA). LDHH's progress and activities are highlighted throughout the report.

On Thursday, January 12, 2012 members of the EPA R6 Drinking Water Section conducted the annual EOY review of LDHH's PWSS program.

The following people participated in the review:

EPA

Blake Atkins, Chief, Drinking Water Section

Andy Waite, Former Louisiana Drinking Water State Program Manager/SDWIS Lead

Amy Camacho, Louisiana Drinking Water State Program Manager

Javier Balli, Louisiana Drinking Water/PWSS Project Officer

Ashley Howard, Former Louisiana Drinking Water/PWSS Project Officer

Hillol Ray, Louisiana Enforcement Project Officer

Nancy Ho, Former DBP Rule Manager

Dawn Ison, GWR Manager/Homeland Security Lead/Emergency Response Manager

LDHH

Jake Causey, Chief Engineer

Caryn Benjamin, Assistant Chief Engineer – D/DBP, SWTR, AR Rule Manager

Joel McKenzie, Drinking Water Revolving Loan Fund Program

Jim McDonald, Drinking Water Revolving Loan Fund Program

Kate Gilmore, Program Manager, Data Manager/Fee Manager

Sean Nolan, Engineer Intern - LCR/Fluoride/CCR/PN Rule Coordinator

John French, Engineer – Phase II/V/Radionuclide Rule Coordinator

Jim Morring, Operator Certification Administrator

Dinah Millet, Former Operator Certification Administrator

II. SUMMARY OF FINDINGS, RECOMMENDATIONS, & HIGHLIGHTS

A. REGULATION ADOPTION

EPA R6 recommends that LDHH continue dedicating the resources necessary to produce and submit primacy packages in order to clear the backlog of rules the State still needs to adopt. These rules include the Stage 2 Disinfectant and Disinfection Byproducts (DBP) Rule, Long-Term 2 (LT2) ESWTR, the Lead and Copper Rule (LCR) short-term revisions, and the Ground Water Rule (GWR).

B. SDWIS/STATE REPORTING

EPA R6 recommends that EPA and LDHH collaborate to produce the following: 1) Develop goals for each six-month period, by rule and violation type, for the percent of compliance decisions made and document LDHH's compliance determinations are at least as stringent as the federal rules; 2) develop goals for each six-month period on the number of inventory discrepancies by type from queries against SDWIS/STATE; and 3) use these two goal-tracking documents to target database work for the following six months.

C. MONITORING WAIVERS

EPA R6 recommends that LDHH consider implementing chemical monitoring waivers since many PWSs in Louisiana have no history of detections and could be reduced to less frequent monitoring with a significant reduction in burden on staff and laboratory capacity.

D. ELECTRONIC REPORTING OF ANALYTICAL RESULTS

EPA requests the State provide a time line for reporting both chemical and bacteriological results electronically through SDWIS/STATE. With the recent migration to SDWIS/STATE Web Release 2, the improvement of companion tools, e.g. Lab-to-State and XML Sampling, will greatly enhance the capabilities of laboratories to report sampling results electronically and for the State to migrate such data into SDWIS/STATE.

E. WATER SYSTEM SAMPLE SCHEDULES AND SAMPLING BACKLOG

LDHH has been working on resolving the backlog of samples, (e.g., lead/copper, VOCs, SOCs, etc.). This further emphasizes the need to institute electronic reporting of the samples and sample results with the laboratories and implement a scheduling business system.

F. AREA WIDE OPTIMIZATION PROGRAM

EPA R6 supports the use of state AWOP programs as important tools for staff development, program innovation, and rule implementation. Although AWOP is not a required PWSS program element and is a voluntary program for primacy agencies to consider for implementation, we recommend LDHH recommit its level of effort in this area. Small systems are an Agency priority and the AWOP program is a key component in addressing this small system agency priority.

III. PRIMACY REQUIREMENTS

The annual program review required under 40 CFR Section 142.17 requires that EPA conduct a program review at least annually to determine if the State is meeting the requirements of 40 CFR Section 142.10 in order to retain primacy. These requirements include the following statutory categories:

- Adoption of state regulations that are no less stringent than federal requirements
- Adoption and implementation of enforcement procedures
- Recordkeeping and reporting
- Variances and exemptions
- Planning for provision of safe water in emergencies

In accordance to 40 CFR Section 142.10, there are 15 elements found in the above five statutory categories, defined under Attachment A of this report. It is these 15 elements that are evaluated by EPA R6, either through the annual PWSS program review conducted by the Source Water Protection Branch, Drinking Water Section; the enforcement program review conducted separately by the Enforcement and Compliance Assurance Division; or the financial review on the DWSRF program also conducted separately by the Assistance Program Branch, State and Tribal Programs Section.

IV. PRIMACY ORGANIZATION AND STAFFING

LDHH is the primacy agency in the State of Louisiana for administering the State's drinking water program. Staff from the LDHH OPH Engineering Services Division implements primacy program requirements and associated regulations.

The LDHH central office is located in Baton Rouge, along with four district offices and nine regions. The district offices are located in New Orleans, Baton Rouge, Lafayette, and Shreveport. These offices coordinate compliance determination and monitoring for the nine regions. Each Region is composed of four to twelve parishes of various sizes.

LDHH central office staff members oversee program and rule implementation, rule adoption, technical assistance, data management, and enforcement activities. This oversight by LDHH is provided to ensure rule compliance requirements are achieved and to assist water systems in doing so. Central staff also administrates contractual agreements with other state agencies. Communication is conducted with regional field staff on a regular basis through e-mails, telephone, fax, direct site visits, weekly NetMeeting conference calls, and bi-monthly videoconferences.

Regional staff members are comprised of engineers, sanitarians, and clerical support. Engineers conduct plan and specification reviews, provide technical assistance to water systems, and conduct sanitary surveys. Central office sanitarians conduct sanitary surveys, perform Total Coliform Rule (TCR)

compliance, and collect chemical samples. Parish sanitarians presently provide some technical assistance and initial complaint response related to drinking water, wastewater, plumbing, public buildings, schools, jails, prisons, and swimming pools. They are also responsible for the collection of samples for bacteriological analyses and chlorine residuals.

This year LDHH staff members have worked to fill many of the vacancies both in the regional offices and in the central office. The total amount of full-time equivalent (FTE) levels to support the primacy program is 45. All regional offices are at the maximum allowed state staffing levels. There are now two engineers and two sanitarians in Region IX, which has the greatest number of water systems and wells, and there is at least one engineer and one sanitarian in each region. However, student worker positions were eliminated due to state revenue budget cuts this past year which will most likely not be backfilled.

V. UNIVERSE of WATER SYSTEMS

The State of Louisiana has 1,403 active public water systems (PWS), of which 1,049 are community water systems according to the LDHH Safe Drinking Water Data Information System (SDWIS) records as of FY 2011. The water sources for these PWSs are 1,235 ground water (GW) wells, 64 surface water (SW) intakes, and 104 purchased water systems.

VI. RULE ADOPTION AND RULE IMPLEMENTATION

One major requirement in maintaining primacy is for the State to adopt drinking water regulations which are no less stringent than the National Primary Drinking Water Regulations (NPDWRs). LDHH has often been behind in rule adoption and sometimes well beyond the maximum regulatory two-year extension period due to state budget constraints. However, EPA appreciates LDHH's commitment to implement rules not yet adopted, per an EPA/LDHH workload extension agreement. State rule implementation activities conducted by LDHH include (but are not limited to) compliance determination, the issuance of informal notices of violations, and issuing public notice requirements if required. [Formal enforcement (such as the issuance of Administrative Orders) remains to be carried out by EPA R6 enforcement staff until LDHH receives primacy for rules yet to be adopted.]

EPA R6 appreciates LDHH's efforts with rule adoption this year. LDHH management reassigned one full-time staff person to further develop state regulatory language, as well as develop a primacy program revision application for the following five rules: Public Notification Rule (PN), Radionuclide Rule, Filter Backwash Rule, Arsenic Rule (AR), and Long Term 1 Enhanced Surface Water Treatment Rule (LT1 ESWTR). LDHH received interim primacy for these rules on April 27, 2011 by EPA R6. EPA R6 granted final primacy August 31, 2011. LDHH next steps will be to submit a primacy program revision application for three additional rules by June 2012: the Stage 2 DBP Rule, LT2 ESWTR, and the LCR short-term revisions. LDHH published the Notice of Intent (NOI) for these rules in the State Register on December 20,

2011, and anticipates the rules to be effective as part of the Louisiana state drinking water regulations July 2012. LDHH will soon after submit a primacy program revision application to EPA R6. LDHH will then only lack adoption of the most recent promulgated rule, the GWR. December 2012 is when LDHH anticipates publishing the NOI in the State register for adoption of the GWR and request primacy for this rule early 2013.

The following table outlines the State's status on rule adoption. The rule deadlines do not include the allowable two-year extensions. A complete chart of the LDHH program revision and update information can be found under Attachment B of this report.

Rule Name	Deadline	State Adoption		EPA Approval	
		Status	Date	Status	Date
PN Rule	5/6/04	Adopted by Reference	Mar-09	Approved August 31, 2011	
Radionuclide Rule	12/7/04	Adopted by Reference Jun-09			
Filter Backwash Rule	6/8/05				
Arsenic Rule	1/21/05				
LT1 Rule	1/14/06				
Stage 2 DBP Rule	1/4/08	Adopted by Reference	Dec-11	Projected	July 2012
LT2 ESWTR	1/4/08	Adopted by Reference	Dec-11	Projected	July 2012
Ground Water Rule	11/22/08	Adopted by Reference	Dec-12	Projected	Jan 2013
Lead/Copper Short Term Revisions	1/4/08	Adopted by Reference	Dec-11	Projected	July 2012

Prior to FY 2011, LDHH was granted primacy for the new PWS definition, Administrative Penalty Authority, Consumer Confidence Report (CCR), TCR, IESWTR, Stage 1 DBPR, LCR minor revisions, and the Interim Radionuclide Rule. See below contact information regarding upcoming rules for adoption:

<u>Rule</u>	<u>State Contact</u>	<u>EPA Contact</u>	<u>EPA Phone</u>
DBPR 1 & 2	Caryn Benjamin	Amy Camacho	(214) 665-7175
LT-1 & 2	Caryn Benjamin	Mark McCasland	(214) 665-8088
LCR	Sean Nolan	Julie Hankinson	(214) 665-3185
GWR	Kate Gilmore	Dawn Ison	(214) 665-2162

EPA R6 Recommendation: EPA R6 recommends that LDHH continue dedicating the resources necessary to produce and submit primacy packages in order to clear the backlog of rules the State still needs to adopt. These rules include the Stage 2 DBP Rule, LT2 ESWTR, LCR short-term revisions, and the GWR.

A. GROUND WATER RULE

The GWR was effective January 8, 2007 and compliance determinations began December 1, 2009. This rule requires water systems to perform Triggered Source Monitoring if they are notified of a positive TCR sample. LDHH covers the cost of additional samples since they already take about 65,000 samples annually for TCR. Some systems choose to conduct Compliance Monitoring (4-log treatment) to avoid source sampling requirements. The GWR also requires water systems to respond to State requests for corrective actions and additional source water assessment monitoring. LDHH relies heavily on the Electronic Sanitary Survey SWIFT tool to fully implement the GWR.

Overall the GWR implementation process conducted by LDHH continues to go smoothly. Dawn Ison, the EPA R6 GWR manager, continues to assist LDHH when needed while Andy Waite, the EPA R6 SDWIS lead, continues to provide support with SDWIS database issues. And as noted under Rule Adoption and Rule Implementation, LDHH anticipates publishing its NOI to adopt the rule by December 2012 as part of the Louisiana state drinking water regulations, and receive primacy approval for the rule early 2013.

B. STAGE 1 AND STAGE 2 DISINFECTANTS AND DISINFECTION BYPRODUCTS RULE

LDHH requires mandatory disinfection, although prior to 1996 systems were permitted to apply for a waiver from the requirement based on their TCR compliance history and site-specific conditions. These waivers are no longer offered to systems, and are revoked if a system has a TCR violation. Currently, there are 47 systems that have maintained their waivers.

For the Stage 1 DBPR and Stage 2 DBPR, there are 1,139 water systems in Louisiana that are required to comply with each of the aforementioned rules. When the Stage 1 DBPR was promulgated, LDHH implemented the Stage 1 DBPR for all water systems that delivered disinfected finished water to its customers. As a result, many PWSs had a disinfection byproducts sampling plan in place when the Stage 2 DBPR was promulgated in 2006. In addition, PWSs were able to benefit by qualifying early for exemptions of the Initial Distribution System Evaluation (IDSE) requirements under the Stage 2 DBPR.

In calendar year 2012, water systems begin complying with the Stage 2 DBPR compliance monitoring requirements in a phased in approach and staggered timeline. LDHH is managing TTHM and HAA5 analytical capacity by phasing in the Stage 2 DBPR compliance monitoring requirements as noted below.

Stage 2 DBP Compliance Monitoring Schedule¹:

Water System Schedule and Population		Submit Compliance Monitoring Plan	Compliance Monitoring Starts ²	
			Quarterly Monitoring	Annual Monitoring
1	Serving 100,000 or more individuals	October 31, 2011	1st Quarter of 2012	2012
2	Serving between 50,000 - 99,999	December 31, 2011	2nd Quarter of 2012	2012
3	Serving between 10,000 - 49,999	April 1, 2012	2nd Quarter of 2013	2013
4	Serving less than 10,000	October 1, 2012	3rd Quarter of 2013	2013

¹ If you purchase water from a system that has an earlier schedule, then you must follow their time schedule.

² Systems must monitor during their Peak Historical Month.

Currently, Louisiana PWSs are responsible for collecting and sending Total Trihalomethane (TTHM) and Haloacetic Acid (HAA5) samples to certified labs for analyses. Results are then forwarded to the LDHH central office. In December 2011, LDHH proposed an electronic reporting regulation that required certified laboratories to submit drinking water results in an electronic format specified by LDHH's Drinking Water program. The next step related to processing electronic drinking water results is for LDHH to standardize sample location codes and to create official sample site nomenclatures to expedite/facilitate electronic data reporting, which LDHH anticipates will occur at the end of calendar year 2013.

EPA R6 commends LDHH in its foresight to require electronic data reporting of drinking water results, and believes that this will allow LDHH to more effectively utilize resources as well as expedite compliance determinations.

In addition to PWSs beginning monitoring for the Stage 2 DBPR compliance monitoring requirements in calendar year 2012, determination of compliance calculations will change from the Running Annual Average (under the Stage 1 DBPR) to the Locational Running Annual Average. Since the compliance calculation requirements for TTHM and HAA5 are stricter under the Stage 2 DBPR, it is estimated that 60 water systems will be noncompliant with the Stage 2 DBPR maximum contaminant level (MCL) requirements, based on the Stage 1 DBPR MCL violations during fiscal year 2010 and the Stage 2 DBPR IDSE sample results.

Under the Stage 1 DBPR, there are about 500 ground water systems serving (500-10,000 population) that are required to sample at one location per year. Under the Stage 2 DBPR, this group of systems will be required to sample at two locations per year. This is about double the requirement. During the program review discussion, LDHH clarified to EPA R6 it has a total of 22 certified laboratories for TTHM and HAA5 analyses. LDHH also stated the State's drinking water laboratory, although it does not conduct TTHM and HAA5 analyses, is also certified for disinfection byproducts analyses as back-up. EPA R6 notes that the staggered early requirement for Stage 2 DBPR monitoring, in addition to having almost two dozen certified laboratories now requiring electronic data reporting, should expedite compliance determinations of Stage 2 DBPR monitoring and may help mitigate any challenges

related to laboratory capacity. LDHH management did not note any concerns related to laboratory capacity for the Stage 2 DBPR.

As noted under Rule Adoption and Rule Implementation, LDHH published its NOI to adopt the Stage 2 DBPR rule on December 20, 2011, and anticipates the rule to be effective as part of Louisiana state drinking water regulations July 2012. EPA R6 anticipates LDHH will shortly thereafter request rule adoption of Stage 2 DBPR along with several other drinking water rules in a primacy program revision application.

EPA R6's role and work activities for LDHH

- 1) State-wide violation status lists for the Stage 2 DBPR (and LT2 ESWTR)
- 2) Enforcement referrals for noncompliant systems
- 3) Issuance of AOs

LDHH's activities

- 1) Compliance assistance activities such as phone calls, notice of violation letters, approval letters, etc.
- 2) Maintaining the Data Collection Tracking System database
- 3) Entering violation determinations made by EPA Region 6 into SDWIS
- 4) Ensuring that systems update their disinfection byproducts rule compliance sampling plan to meet Stage 2 DBPR requirements

C. LONG TERM 1 AND LONG TERM 2 ENHANCED SURFACE WATER TREATMENT RULE

Under the Surface Water Treatment Rule (SWTR), states were required to determine ground water sources under the direct influence of surface water. LDHH made these determinations, and is classifying ground water systems under the direct influence of surface water (GWUDI) as surface water systems and thus subject to all applicable surface water treatment rule regulations. This includes mandated filtration and Cryptosporidium monitoring which has now been completed for all surface water systems.

LDHH still lacks adoption of the LT2 ESWTR. The State, similar to that of the Stage 2 DBP Rule, implements the rule even though they have yet to receive primacy. LDHH anticipates adoption of the Rule by July 2012.

D. LEAD AND COPPER RULE

The deadline for LDHH to adopt the LCR short-term revisions was October 2010 but in December 2009, a two-year extension was requested. LDHH had until December 2011 to submit a final primacy revision package but was not able to meet this deadline. LDHH did publish a NOI to adopt the LCR revisions as part of the Louisiana state drinking water regulations on December 12, 2011. EPA expects to receive a primacy package that will include the revision by July 2012.

VII. OTHER PWSS PROGRAM INITIATIVES and STATUTORY REQUIREMENTS

On August 6, 1996, the SDWA Amendments of 1996 were signed into law. This section of the report covers Louisiana's achievements in implementing the activities contained in the 1996 SDWA Amendments and other PWSS program initiatives supporting the State's primacy program.

A. MAINTENANCE OF AN INVENTORY OF PUBLIC WATER SYSTEMS

The requirement of the State to maintain an inventory of public water systems is covered under 40 CFR Section 142.10(b)(1).

The State is meeting this requirement and maintains a complete inventory of public water systems in the Safe Drinking Water Information System/State (SDWIS/STATE). SDWIS/STATE is an information management system developed and supported by EPA.

States have 45 calendar days after the end of every calendar quarter to submit data to the National SDWIS database. This data can include inventory (at least annually), violations, enforcement actions, monitoring data, site visits (including sanitary surveys), and any other data relevant to the regulation of public water systems. The State has successfully met this deadline on a timely basis over the past year including quarterly updates to the inventory. LDHH does not currently have a systematic QA/QC program in place to evaluate the completeness and accuracy of their inventory data.

Results of an analysis of current inventory issues

Issue	Number of Instances
Active Facilities Not Flowing	719
Active Facilities Flowing to Inactive Facilities	139
Permanent Facilities Flowing to Emergency Facilities	5
Inactive Facilities Flowing	636
GW Facilities Without Water Type Code	1055
Selling Facilities Availability Unknown	14
Treatment Plants Without Locational Data	251

B. CAPACITY DEVELOPMENT

Section 1420(a) of SDWA requires States to obtain legal authority or other means to ensure that all new community and non-transient non-community systems commencing operations after October 1, 1999 have financial, managerial, and technical (FMT) capacity to meet the NPDWRs. It further states that States are required to develop and implement a capacity development strategy to assist public water systems in acquiring and maintaining FMT capacity. Failure to meet the SDWA provisions could also result in a 20% withholding of the State's DWSRF allotment. Louisiana has

successfully obtained statutory language, which ensures the capacity of new systems through the use of control points. These control points include plan and specifications, a business plan, operator certification, financial audits, and management training. An Attorney General Statement has been obtained certifying the State has the ability to ensure new system capacity. EPA R6 approved LDHH's New System Capacity Development Strategy on February 8, 1999, and approved the Existing System Capacity Development Strategy in September 2000.

In LDHH's New System Capacity Development Strategy, all new systems are required to submit engineering plans to LDHH in order to obtain the permit necessary to construct proposed new water systems. Those plans are reviewed by an engineer in the State's DWSRF program. The Capacity Development Coordinator is notified upon receipt of the engineering plans and forwards a copy of the Business Plan for new systems to the appropriate parties for completion. This business plan is designed to secure information from the applicant relative to FMT capacity. During FY 2011, there were no systems that applied for permits to operate and construct. For existing systems, in accordance to LDHH's Existing System Capacity Development Strategy, LDHH selected 20 existing systems per quarter from violations data to undergo Capacity Assessment. Once selected, a system undergoes a sanitary survey and is required to complete a business plan. LDHH's management training database is reviewed to ensure that all decision makers affiliated with the selected system have undergone training. Those persons not having completed training are notified to attend a training session within six months of the date of notification. During FY 2011, a total of 249 attendees were added to LDHH's management training database. These attendees were trained by Technical Assistance (TA) Providers approved by the state. Also through the Existing System Capacity Development Strategy, any public water system requesting financing thru the Louisiana DWRLF Program is required to submit a business plan to the Capacity Development Program to ensure the proposed project has the technical, managerial, and financial capacity to improve the public water supply for citizens of Louisiana. During FY 2011, five systems submitted business plans and were approved through Capacity Development Program. These systems include: *City of Alexandria, Avoyelles Parish WWD #1, Town of Blanchard, City of Mansfield, and Terrebonne Consolidated WWD.*

During FY 2011, TA providers included the Louisiana Rural Water Association (LRWA) and the Community Resource Group (CRG). These contractors provide on-site assistance to water systems throughout the capacity assessment process, as mentioned above. Also, the TA providers conduct targeted training to very small systems (population less than 500), held quarterly throughout the state.

In accordance to Section 1420 (b) of the SDWA Amendments of 1996, states are required to report annually on the implementation of their EPA-approved capacity development strategy as well as provide a state list of community water systems and non-transient non-community water systems that have a history of

significant non-compliers, due by September 30th annually. Failure to meet this requirement could result in a 20% withholding of the following state's DWSRF allotment. EPA R6 received LDHH's FY 2011 annual report via email on September 19, 2011. In addition to this reporting requirement, every three years by September 30th of the third year, states must submit a report to their Governor that must also be available to the public on the efficacy of the strategy and progress made toward improving the FMT capacity of public water systems in the State. In FY 2011, this report was due and LDHH provided a copy of the report provided to the Governor to EPA R6 via email on September 19, 2011.

C. OPERATOR CERTIFICATION

Louisiana requires all surface water systems to have a certified operator. Due to this requirement, there are many opportunities to maintain certification, especially for small systems. Approximately 9,900 operators attended 562 operation certification training sessions in Louisiana this fiscal year. Operators are required to take courses to renew their license every two years. During sanitary surveys or loan processing, the operator's points are checked through a website, and updated contact information is collected. The database has improved greatly and is becoming more user-friendly although LDHH is still pursuing a contract for additional enhancements. LDHH has also been issuing identification cards for all certified operators. As of the end of the state fiscal year 2011, 90% of operators received ID cards. LDHH's next step is to acquire scanning equipment that can read these cards to quickly check operators' training progress or exam eligibility when needed.

LDHH provided 10 individual operator certification trainings across the state. Anyone who attended the 32-hr training course was qualified to take the exam at any of the eleven different testing locations. In addition to LDHH trainings, the State contracted with three technical assistance (TA) providers to conduct over 50 trainings and host 4 annual conferences for water operators. TA providers included the Louisiana Rural Water Association (LWRA), Louisiana Water Environment Association (LWEA), and the Louisiana Conference on Water Supply, Sewerage and Industrial Wastes, Inc.

EPA approved the LDHH Operator Certification Program in June 2001. Per the SDWA provisions, states are required to report annually on the implementation of their operator certification program by September 30th of each year. Failure to meet this requirement could result in a 20% withholding of the following state's DWSRF allotment. EPA R6 received LDHH's FY 2011 annual report via email on September 29, 2011.

D. SOURCE WATER PROTECTION

Section 1453 of the 1996 SDWA requires primacy States to submit to EPA for approval a Source Water Assessment Program (SWAP) by February 6, 1999 (i.e., 18 months after EPA published the final guidance in August 1997). LDHH

submitted their SWAP to EPA R6 for approval on February 6, 1999. The plan delineates source water protection areas, provides for an inventory of significant contaminants in these areas, and determines susceptibility to contamination in these areas. Continuation of the State's source water protection and wellhead protection programs are now administered by the Louisiana Department of Environmental Quality (LDEQ) and supported by Clean Water Act funding. LDEQ staff members coordinate with LDHH staff on updates to the SWAP and information sharing activities.

E. AREA WIDE OPTIMIZATION PROGRAM

LDHH was not active in the Area Wide Optimization Program (AWOP) during fiscal year 2011. This was a departure from previous years when LDHH was recognized as a regional and national leader in the program. LDHH did attend and participate in the national AWOP meeting in Cincinnati in early 2011. However, no one representing LDHH attended the EPA R6 AWOP meeting at either Little Rock, Arkansas, in March 2011 or Austin, Texas in October 2011 (FY 2012). In addition, there were no ongoing optimization projects undertaken by LDHH in FY 2011.

EPA Recommendation: EPA R6 supports the use of state AWOP programs as important tools for staff development, program innovation, and rule implementation. Although AWOP is not a required PWSS program element and is a voluntary program for primacy agencies to consider for implementation, we recommend LDHH recommit its level of effort in this area.

F. WATER SECURITY

LDHH staff members administer the Water Security Program, and assist with the LaWarn program (mutual aid program run by the utilities). LDHH has fully integrated with the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) and currently has a seat under Emergency Support Function-12 (ESF-12) at the State Emergency Operations Office to handle drinking water and waste water issues. Under Department of Energy (DOE) coordination, ESF-12 is an integral part of the larger DOE responsibility of maintaining continuous and reliable energy supplies for the United States. LDHH has also rewritten the State Emergency Response Plan to include assistance for water utilities under the GOHSEP. LDHH assists in identifying critical water and wastewater systems requiring priority power restoration and also conveys this information to EPA R6 upon request. LDHH staff members are trained in both the National Incident Management System (NIMS) and Incident Command System (ICS). LDHH conducts drills every few months to prepare for water system emergencies. Staff members have worked with EPA R6 to initiate and implement the Response Manager Program to manage data associated with water system status and assessments during emergency events.

G. SANITARY SURVEYS

Sanitary surveys are conducted by regional engineering staff, with support from the central office and DWSRF staff on a routine basis. Sanitary surveys have the highest priority in the Regions, where the Regional Engineer is held accountable if the required number of surveys is not completed for each quarter. If a problem arises at a system, surveys are done at the time of investigation. The DWSRF staff also complete surveys as part of the State's Capacity Development Program.

In August 2010, Louisiana implemented the Global Environmental Consulting Safe Water Information Field Tool (SWIFT) tool, abandoning the efforts to implement the EPA sponsored ESS (Electronic Sanitary Survey) tool. The GEC SWIFT tool preloads SDWIS Inventory and site visit details to a tablet PC, where it can be updated directly in the field and migrated back to the SDWIS/STATE database. The SWIFT tool also generates the letter to the PWS automatically and populates the eight required site visit categories as part of the migration. LDHH also purchased 48 new tablets, with a majority dispersed throughout the regions. This enabled LDHH to make great progress in the completion of sanitary surveys this year. LDHH stated during the review, they were able to meet regional targets, having produced reports and inputting results into SDWIS/STATE. LDHH was also able to complete the reports more timely and increase the accuracy of data into SDWIS/STATE. EPA R6 commends LDHH for this accomplishment.

LDHH conducts sanitary surveys on a frequency of once every three years at community water systems (CWS) and once every five years at non-community water systems (NCWS). This is consistent with the requirements of the Interim Enhanced Surface Water Treatment Rule and the Ground Water Rule. During FY 2011, LDHH conducted 471 surveys compared to 422 in FY 2010.

H. LABORATORY CAPACITY AND SAMPLING

NEW LABORATORY AND CERTIFICATIONS

Under 40 CFR Section 142.10(b)(3), the State is required to establish and maintain a State program to certify laboratories conducting analytical measurements of contaminants identified in State primary drinking water regulations as well as designate a laboratory officer or officers certified by the EPA Administrator that are responsible for the State's certification program.

LDHH certifies laboratories throughout the State through their designated laboratory officers. Water system lab certification is primarily for bacteriological analyses for monitoring in accordance to the TCR. LDHH also certifies laboratories for chemical testing of drinking water in accordance to the National Environmental Laboratory Accreditation Program (NELAP), which is accepted by EPA in lieu of EPA's Drinking Water Certification program. The majority of the chemical analyses are conducted in the State's primary drinking water laboratory located in Metairie, LA. The bacteriological analyses are

conducted in one of three State bacteriological labs located in Shreveport, Amite, and/or Metairie, since the Lake Charles laboratory closed in early FY 2012. LDHH consolidated the respective workload by having samples analyzed at the Metairie State laboratory.

In FY 2011, the New Orleans laboratory opened, became fully operational, and is certified to analyze chemical and bacteriological samples. The ability to use this additional State lab will enable routine sample migrations via Lab-to-State and/or Electronic Data Interchange (EDI), allowing for more timely and accurate reporting of data. All drinking water sampling provided by the State are being analyzed by state laboratories. LDHH is also taking over another state laboratory, originally LDEQ's laboratory located in Baton Rouge, due to financial constraints, and adding a laboratory annex. LDHH believes by having the new permanent lab located in Baton Rouge, it will facilitate better communication with the LDHH Central Office. Completion date of the laboratory annex is expected to be by late calendar year 2012.

LABORATORY AVAILABILITY

Assurance of the availability of certified State laboratory facilities capable of performing analytical measurements of all contaminants is specified in the State's primary drinking water regulations, required under 40 CFR Section 142.10(b)(4). In FY 2011, LDHH included rule language requiring that previously certified laboratories were now required to report electronically to the State in accordance to the format provided. Since March 2012, this rule has been in effect for any new laboratory requesting certification.

The new State laboratory in Metairie has been running since 2009 and now has received EPA certification for numerous methods for several drinking water analyses. Labworks is the software the State is using online to deliver electronic chemical data to SDWIS/STATE. LDHH still needs to bring this software, referred to as STAR LIMS, online as it already has been configured to submit electronically their chemical and bacteriological samples and results to SDWIS/STATE. LDHH anticipated conducting a STARLIMS pilot for chemical sampling with a start date of February 1, 2012. Once the pilot is live and all bugs are worked out, LDHH will then transition bacteriological sampling data. Pending the amount of bugs LDHH encounters, they are optimistic the transition will occur July 2012. LDHH will keep EPA R6 informed as they move forward with this initiative.

It is important to note that once the electronic data is made available from STARLIMS, LDHH envisions that the workload will be reduced. For instance, LDHH will be able to calculate maximum residual disinfectant levels (MRDLs) automatically, rather than manually calculating and entering monthly averages.

LDHH still intends to insert complete monitoring schedules for every system into SDWIS/STATE. EPA R6 recommends LDHH consider using the Chem/Rad M/R compliance report at the District level for scheduling sample collection and using the "Possible Increase or Decrease Monitoring" report at LDHH central office to evaluate sources for waivers.

The State is not fully using the sampling schedules capabilities of SDWIS/STATE, but the State is still entering sample results into the system. EPA R6 is concerned however, because the lack of complete sampling schedules leads to staff uncertainty of sample results as well as a reliance on differing processes across the regions, i.e. for the Phase II and V chemicals (all Regions) and the SWTR suite (for Region 2). It is important to note that sample schedules for TCR, CCR, PN and the LCR are in SDWIS/STATE, so this is not an issue for these respective rules.

COLLECTION SCHEDULES

Sample collectors from LDHH collect all samples except for Lead and Copper tap water samples, water quality parameters (WQPs), TTHMs and HAA5s (this defers to the system's responsibility). The state provides systems with a monitoring schedule for the LCR. The current priority is on Phase II/V sampling to reach the goal of every three years for ground water and yearly for surface water systems.

MONITORING WAIVERS

Louisiana has statewide waivers for dioxin and asbestos. LDHH has not developed a chemical waiver program for any other inorganic chemicals (IOCs), volatile organic compounds (VOCs), or synthetic organic chemicals (SOCs). In response to previous recommendations to adopt a waiver program, the State expressed concern that waivers are less protective of public health. However, nearly all states maintain waiver programs and demonstrate through periodic sampling that the waivers are defensible. If a waiver program was instituted, the State's sample collection burden could be dramatically reduced. Also, with consideration by LDHH to sample at entry points to the distribution systems, rather than at every source for routine monitoring, it will reduce monitoring and may significantly reduce the burden on LDHH. This approach could possibly free up staffing resources to develop a chemical waiver program as well as a direct benefit to cost savings.

EPA R6 Recommendation: LDHH should consider implementing chemical monitoring waivers since many PWSs in Louisiana have no history of detections and could be reduced to less frequent monitoring with a significant reduction in burden on staff and laboratory capacity.

I. SAFE DRINKING WATER INFORMATION SYSTEM DATA REPORTING

The State has completed its migration to SDWIS/STATE Web Release 2. Although sampling results continue to be entered into the system, LDHH needs to start using the sampling schedule capabilities of SDWIS/STATE. The lack of complete sampling schedules leads to the under-generation of monitoring and/or reporting violations, with the exception of schedules for TCR.

EPA R6 Recommendation: EPA and LDHH should collaborate to conduct the following:

1. Develop goals for each six-month period, by rule and violation type, for the percent of compliance decisions made and document LDHH's compliance determinations are at least as stringent as the federal rules.
2. Develop goals for each six-month period on the number of inventory discrepancies by type from queries against SDWIS/STATE.
3. Use these two goal-tracking documents to target database work for the following six months.

Sample collection scheduling is determined by the regions, based on the last sample date, geography, and public health concerns. Overall, LDHH is content with SDWIS/STATE scheduling and the summaries that are generated. LDHH plans to reevaluate sample schedules and monitoring periods to ensure they are correctly configured for compliance determination. Generic schedules have been entered into SDWIS/STATE but LDHH wants to evaluate whether systems may require unique schedules.

EPA R6 Recommendation: LDHH should provide a time line for reporting both chemical and bacteriological results electronically into SDWIS/STATE. With the recent migration to SDWIS/STATE Web Release 2, the improvement of companion tools like Lab-to-State and XML sampling will greatly enhance the capabilities of laboratories to report sampling results electronically and for the State to migrate such data into SDWIS/STATE.

J. CONSUMER CONFIDENCE REPORTS

The preparation and mailing of the Final CCRs to systems in the spring consumes a lot of LDHH staff time. LDHH completes compliance determination for the CCR Rule in October to save time so that both types of reporting violations can be issued together. Violations to systems include either failure to issue the report timely and/or failure to certify that the report is adequate (material is missing). Most systems send the CCR and certification form to LDHH by July 1, but some wait to send the report with their certification form before the October 1st deadline. The certification form shows the self-reported distribution date with an affidavit which the system includes, along with the newspaper article. Violations are not issued for content, although the state does review and require the content to meet state rule requirements. If the content doesn't meet these requirements, the system must re-submit and publish, rather than receive a

violation. Also, the State's policy is not to assign a monitoring/reporting (M/R) violation if the CCR certification states that the CCR was distributed by July 1st.

VIII. FUNDING MECHANISMS

A. SAFE DRINKING WATER FEE

The Safe Drinking Water Program is funded through the EPA Public Water Supply Supervision (PWSS) grant and a state-wide Safe Drinking Water Program fee. The PWSS grant funds less than 25% of the Safe Drinking Water Program. The LDHH is required to match 25% of the PWSS Grant and currently matches these grant funds easily. These funds are used to support staffing of the Engineering Services to implement the drinking water program. The balance of the funding is provided by the Safe Drinking Water Program fee which is collected from water systems at an annual fee of \$2.88 per service connection. These fees support staffing of the Engineering Services section to implement the drinking water program and the laboratory analysis on collected water samples to ensure compliance with state and federal drinking water regulations. Attempts to raise the fee have been postponed by DHH management for this legislative session. LDHH senior management is looking at budget cuts for the 2012-2013 year due to reductions in taxes. The effect of these cuts on the Safe Drinking Water Program is not yet known. However, budget cuts over the past two years have resulted in a freeze in both equipment budget and contract budget.

B. PUBLIC WATER SUPPLY SUPERVISION GRANT PROGRAM

LDHH was awarded an increment of \$474,382 on January 10, 2012 of the FY 2012 PWSS allotment even though the final allotment has not been finalized. FY 2012 funding is anticipated to be close to the FY 2011 allotment of \$1,422,000. LDHH requested the remainder of the allotment be awarded collectively versus in the remainder quarterly increments to be received no later than June 30, 2013 due to the lack of state budget support. The LDHH project officer for the PWSS/DWSRF grant programs, Javier Balli, will notify the State once the total allotment has been finalized and announced.

The Quality Assurance requirements for LDHH's PWSS program are current as of the EOY program review. The Quality Management Plan (QMP) is a document describing the overall quality assurance efforts in the State. This includes the State's overall quality management philosophy and the agency's responsibility for administering the quality assurance program. The current approved QMP will expire October 19, 2012. The Quality Assurance Project Plans (QAPP) stress data quality objectives related to sample collection and sample analysis. There are two QAPPs related to the drinking water program. One plan focuses on field sample collection activities and sanitary surveys. The other plan covers laboratory analysis of the collected drinking water samples at the LDHH laboratory. Both QAPPs will expire on November 5, 2013. EPA R6 requests that

revised plans be submitted at least 30 days prior to the expiration of the previously approved plan to allow for review and approval of the updated plan.

C. DRINKING WATER STATE REVOLVING FUND PROGRAM SET-ASIDE FUNDING

LDHH continues to manage and supplement the State's PWSS program with DWSRF set-aside funds. The set-aside funds are used to support various primacy requirements activities supported under various set-aside categories; the Small System Technical Assistance; State Program Management (the State's PWSS Program, Capacity Development Strategy Assistance, and implementation of the State's Operator Certification Program); and Local Assistance (technical assistance providers contracted to assist water systems). The State is allocated up to 2%, 10%, and 15% respectively of each DWSRF annual allotment to fund these initiatives supporting the State's PWSS program.

LDHH submitted its application for the federal FY 2011 DWSRF allotment of \$17,798,000 in November 2011 and is in process of being awarded by EPA R6. LDHH urgently requested the award be made as soon as possible. As of FY 2011, LDHH Engineering Services will no longer be provided Agency general revenue funds to support its' FTE salaries. Thus, it is imperative LDHH receive the FY 2011 allotment award as soon as possible. Mr. Balli reassured LDHH, as the new Louisiana DWSRF/PWSS project officer effective January 2012, that review of the State's application and award of the FY 2011 allotment was top priority.

EPA R6 encourages LDHH to maximize DWSRF set-aside funding to support the drinking water program. LDHH continues to address the challenge of expending unliquidated obligations (ULOs) responsibly. (ULOs are defined as the difference between the amount obligated in the Federal capitalization grant award and the total amount of outlays against that obligation.) From LDHH's FY 2010 DWSRF grant award totaling \$25,649,000, \$1,017,818 remains to be drawn from the set-asides. Mr. Balli encouraged the State to continue drawing remaining funds as expeditiously as possible. ULOs will continue to be a national DWSRF priority as the federal budget continues to be criticized.

More information on this year's DWSRF program activity can be provided by Mr. Balli upon request, as well as in the Louisiana FY 2011 DWSRF Program Evaluation Report conducted by the former project officer, Ashley Howard, from the Assistance Programs Branch, State and Tribal Program Section.

ATTACHMENT A

40 CFR 142.10 Primacy Requirements

Regulations specified in 40 CFR 142.10 require states that have been delegated primary enforcement authority (primacy) for the Safe Drinking Water Act to meet the following requirements:

1. Adopt drinking water regulations which are no less stringent than the national primary drinking water regulations (NPDWRs);
2. Adopt and implement adequate procedures for enforcement of such State regulations;
3. Maintain an inventory of public water systems;
4. Develop a systematic program for conducting sanitary surveys of public water systems in the State;
5. Establish and maintain a State program for the certification of laboratories conducting analytical measurements of drinking water contaminants;
6. Assure the availability to the State of laboratory facilities certified by the Administrator and capable of performing analytical measurements of all contaminants specified in the State primary drinking water regulations;
7. Establish and maintain an activity to assure that the design and construction of new or substantially modified public water system facilities will be capable of compliance with the State primary drinking water regulations;
8. Have authority to apply State primary drinking water regulations to all public water systems in the State;
9. Have authority to sue in courts of competent jurisdiction to enjoin any threatened or continuing violation of the State primary drinking water regulations;
10. Have right of entry and inspection of public water systems;
11. Have authority to require suppliers of water to keep appropriate records and make appropriate reports to the State;
12. Have authority to require public water systems to give public notice that is no less stringent than EPA requirements in 40 CFR 142.32 and 142.16(a);
13. Have authority to assess civil or criminal penalties for violation of the State's primary drinking water regulations and public notice requirements;
14. Have authority to require community water systems to provide consumer confidence reports as required under 40 CFR part 141, subpart O;
15. Establish and maintain record keeping and reporting of its activities, including quarterly reports to the Administrator (Safe Drinking Water Information System) of violations, enforcement actions, notification of any variances and exemptions, and water system inventory information from the previous quarter;
16. If the State permits variances or exemptions, or both, from the requirements of the State primary drinking water regulations, the State shall do so under conditions and in a manner no less stringent than federal requirements;

17. Adopt and implement an adequate plan for the provision of safe drinking water under emergency circumstances;
18. Have authority for assessing administrative penalties.

ATTACHMENT B

Primacy Revision & Program Update For Louisiana

(Revised 11/15/10)	State Adoption		Final Primacy Revision Application		Final EPA Approval	
Rule	Status	Date	Status	Date	Status	Date
IESWTR	Adopted	12/02	Received	03/02	Approved	4/05
Stage 1 DBPR	Adopted	6/04	Received	9/03	Approved	4/05
CCR	Adopted	8/00	Received	5/00	Approved	7/03
Administrative Penalty Authority	Adopted	6/00	Received	5/00	Approved	7/03
Arsenic Rule	Adopted	7/09	Received	4/11	Approved	8/11
Public Notification Rule	Adopted	10/09	Received	4/11	Approved	8/11
Radionuclide Rule	Adopted	7/09	Received	4/11	Approved	8/11
Filter Backwash Recycling Rule	Adopted	7/09	Received	4/11	Approved	8/11
LT 1 Rule	Adopted	7/09	Received	4/11	Approved	8/11
New PWS Definition	Adopted	6/00	Received	5/00	Approved	7/03
LCR Minor Revisions	Adopted	10/04	Received	6/04	Approved	4/05
Variance and Exemption Rule	Adopted	8/00	Received	5/00	Approved	4/05
LT2 ESWTR	Projected	5/12	TBD	Extension Expired on 1/04/2010		
Stage 2 DBPR	Projected	5/12	TBD	Extension Expired on 1/05/2010		
Ground Water Rule	Projected	12/12	TBD	Extension Expired on 1/05/2010		
Lead and Copper Rule Minor Revisions & Clarifications	Projected	05/12	TBD	TBD	TBD	TBD

ATTACHMENT B (continued)

Program Area	Deadline for EPA Final Approval	Draft Program Submitted		Final Program Approval	
		Projected	Actual	Projected	Actual
Capacity Development-existing systems	08/06/00		03/21/98	09/00	08/00
Operator Certification	02/05/01		06/21/99	02/01	06/01

ATTACHMENT C
FY 2011 Louisiana Violation Data and Inventory Population Served Information

Number of Systems in Violation in Louisiana During FY2011 (July 1, 2010 thru June 30, 2011 as of 10/26/2011) (Small <=3,300, Medium 3,301-10,000, Large >10,000)											
MCL, TT, MRDL Violations		Community			Non-Transient Non-Community			Transient Non-Community			Total
		Small	Medium	Large	Small	Medium	Large	Small	Medium	Large	
Phase II/V	Arsenic	10	1		1						12
Disinfection By-Products Rule	Stage 1	2	2	3							7
											-
Surface Water Treatment Rules	SWTR	1		1							2
	Long Term 1			1							1
	Long Term 2										-
Ground Water Rule		4	2								6
Total Coliform Rule		33	12	8	5			6			64
M and R and Consumer Notification Violations		Community			Non-Transient Non-Community			Transient Non-Community			Total
		Small	Medium	Large	Small	Medium	Large	Small	Medium	Large	
Disinfection By-Products Rule	Stage 1	4	2	1							7
	Stage 2	2									2
Surface Water Treatment Rules	SWTR	3									3
	Long Term 1	3	1	1							5
	Long Term 2										-
Lead and Copper Rule		146	12	1	14						173
Ground Water Rule		17	2	2	2			3			26
Total Coliform Rule		20	3	4	4			6			37
Consumer Notification	CCR	101	5								106
	PN	16	4		2			2			24

Number of Violations in Louisiana During FY2011 (July 1, 2010 thru June 30, 2011 as of 10/26/2011) (Small <=3,300, Medium 3,301-10,000, Large >10,000)											
MCL, TT, MRDL Violations		Community			Non-Transient Non-Community			Transient Non-Community			Total
		Small	Medium	Large	Small	Medium	Large	Small	Medium	Large	
Phase II/V	Arsenic	34	2		3						39
Disinfection By-Products Rule	Stage 1	4	4	6							14
											-
Surface Water Treatment Rules	SWTR	1		1							2
	Long Term 1			1							1
	Long Term 2										-
Ground Water Rule		4	2								6
Total Coliform Rule		41	14	9	5			7			76
M and R and Consumer Notification Violations		Community			Non-Transient Non-Community			Transient Non-Community			Total
		Small	Medium	Large	Small	Medium	Large	Small	Medium	Large	
Disinfection By-Products Rule	Stage 1	9	2	1							12
	Stage 2	2									2
Surface Water Treatment Rules	SWTR	16									16
	Long Term 1	15	6	4							25
	Long Term 2										-
Lead and Copper Rule		165	13	1	15						194
Ground Water Rule		20	3	2	2			4			31
Total Coliform Rule		23	3	5	4			6			41
Consumer Notification	CCR	164	9								173
	PN	18	4		2			2			26

Number of Systems in Louisiana During FY 2011															
LA	GU		GUP		GW		GWP		SW		SWP		TOTAL		LA
	Sys	Pop	Sys	Pop	Sys	Pop	Sys	Pop	Sys	Pop	Sys	Pop	Sys	Pop	
C	-	-	-	-	887	2,788,697	72	103,927	58	1,952,926	32	75,978	1,049	4,921,528	C
NTNC	-	-	-	-	138	50,024	-	-	6	6,447	-	-	144	56,471	NTNC
NC	-	-	-	-	210	47,876	-	-	-	-	-	-	210	47,876	NC
TOTAL	-	-	-	-	1,235	2,886,597	72	103,927	64	1,959,373	32	75,978	1,403	5,025,875	TOTAL

